

### **1. INTRODUCTION**

1.1 Meallmore Ltd is committed to protecting the privacy and security of your information. This privacy notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we will store and handle that data, and keep it safe. It is likely that we will need to update the privacy notice from time to time. We will publicise any significant changes but you are welcome to ask us questions about the notice or check the online version at any time.

1.2 We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

### **2. EMPLOYEES: PERSONAL DATA THAT WE PROCESS**

2.1 Personal data means any information about an individual from which that person can be identified. It does not include anonymous data where the identity has been removed.

2.2 We will collect, store, and use the following categories of personal data about you:

1. A person's name
2. Government issued id numbers such as a passport number.
3. Physical address and digital addresses such as an IP address.
4. Contact information such as a telephone number and email address.
5. Birth date, age, gender, race and other biographical details.
6. Technical identifiers such as a service ID that can be tied back to a person's name or location.
7. 'Biometric data' includes fingerprints and facial recognition (for the purpose of computer security).
8. Medical data such as search queries related to medical conditions or a person's medical history.
9. Details of any financial or commercial transactions such as salary or the amount of a purchase.
10. CV, job history, performance reviews and other career-related records.
11. Records maintained by governments and institutions such as school grades and records.
12. Information pertaining to a person's behavior such as a record of the websites they visit. Includes user input such as submission of data in a web form.
13. A record of where a person has physically been.

14. Photographs of a person and recordings of their voice.
15. Communications such as messaging, email and voice conversations.

2.3 We may also collect, store and use the following “special categories” of more sensitive personal information:

1. Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
2. Information about your health, including any medical condition, health and sickness records.
3. Information about criminal convictions and offences.

#### 2.4 Criminal convictions

We may only process data relating to criminal convictions where a legitimate interest or law allows us to do so. This will usually be where such processing is necessary to carry out our obligations.

Rarely, we may use your personal data relating to criminal convictions where necessary in relation to legal claims, where it is necessary to protect your interests (or someone else’s interests) and you are not capable of giving your consent, or where you have already made the information public.

If we decide to offer you employment, we will then carry out a criminal check before confirming your appointment.

### **3. HOW WE USE YOUR PERSONAL DATA**

3.1 We will only process your personal data if we have legitimate (Legitimate Access) and lawful grounds for processing such data. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform a contract between us.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

3.2 We may also use your personal data in the following situations, for example:

1. Where we need to protect your interests (or someone else’s interests).
2. Where it is needed in the public interest or for official purposes.

#### **4. PURPOSES FOR WHICH WE PROCESS YOUR PERSONAL DATA**

4.1 We will only use your personal information in one or more of the following circumstances.

1. We have been given responsibility and duties by law and we need to use personal information to comply with those obligations.
2. We have been given an important function or job by law and need to use personal information to fulfill that function.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
4. When we have your consent to do so.
5. Where we need to protect your interests (or someone else's interests).

4.2 Some personal information has been given higher protection, this is called Special Category Information, we will only use that category of information when we have additional reasons. Most commonly this will be because:

1. There is a substantial public interest in us fulfilling our legal duties and responsibilities.
2. We need to comply with social security law.
3. Where we need to protect your interests (or someone else's interests) and that person is not able to give consent.
4. We will also only process this type of information for archiving or undertaking scientific or other research when we know we have appropriate protections in place. If you decide not to provide us with certain personal data that we have requested, we may not be able to perform contracts between us (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

4.3 When that information is important to some named organisations for their work. These include:

1. The Care Inspectorate (for purposes relating to their role as a regulator of care homes)
2. The Scottish Social Security Council (for purposes relating to their role as the registrar for care workers)
3. The Information Commissioner (for purposes relating to their role as the regulator for Data Protection)
4. If a court or a law tells us we need to release information.
5. Health and Safety Executive
6. Nurse and Midwifery Council
7. HMRC
8. Local Government and Government agencies
9. Insurance purposes

4.4 We sometimes use third parties to provide us with services and they may need to process information to do so. This may include people or organisations who provide us with services necessary for us to conduct our business.

These include:

1. IT services
2. Legal services
3. Professional advisers and consultants
4. Independent complaints review services
5. Courier and secure shredding services
6. Survey management and processing services

4.5 We monitor and assess all the work we do to improve the quality of our work and to help us know when we need to put training in place.

### **5. DATA RETENTION**

5.1 We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

5.2 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

5.3 In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

5.4 Once you are no longer an employee, worker or contractor of the company we will retain or securely destroy your personal information in accordance with applicable laws and regulations.

### **6. HOW WE USE OUR WEBSITE**

6.1 When you use our websites we collect information to help us understand how our website is being used. We also use cookies to help make our website easier to use by:

1. Enabling a service to recognise your device so you don't have to give the same information during one task, for example to remember the information you entered on the first page of a multi-page form.
2. Remembering settings so you don't have to re-enter them every time you visit a new page.
3. Measuring how many people are using the website and how they navigate the website, so that we can identify ways to make it easier to use and make sure that there is enough capacity for the website to perform well and respond quickly.

6.2 Our cookies aren't used to identify you personally. They're just here to make the site work better for you. Indeed, you can manage and/or delete these small files as you wish. We provide more information about our cookies, how they are used and how long they are stored for directly on our website in our Cookie Policy.

### **7. MARKETING COMMUNICATIONS**

7.1 You will receive marketing communications from us if you have:

1. Requested information from us or purchased goods or services from us; or
2. If you provided us with your details and ticked the box at the point of entry of your details for us to send you marketing communications; and
3. In each case, you have not opted out of receiving that marketing.

7.2 You can ask us to stop sending you marketing messages at any time by checking or unchecking relevant boxes to adjust your marketing preference or by emailing us at [gdprequiry@meallmore.co.uk](mailto:gdprequiry@meallmore.co.uk) at any time.

7.3 Where you opt out of receiving our marketing communications, this will not apply to personal data provided to us as a result of a service provided, service experience or other transactions.

### **8. COLLECTING INFORMATION VIA SURVEYS**

When you respond to any surveys we will collect and analyse the responses you give us to help us improve our service. We will not process any data that is included in any response to a survey that could identify an individual. Personal information will be destroyed as soon as we become aware of it. We may use third party services such as Survey Monkey. Their privacy notice is available on their website <https://www.surveymonkey.com/mp/legal/privacy-policy> (link is external).

### **9. TRANSFERS OUTSIDE OF THE EEA**

9.1 We may transfer your personal information outside the EEA. If we do, you can expect a similar degree of protection in respect of your personal information.

9.2 Where we transfer your personal data to countries where there is no adequacy decision by the European Commission in respect of that country, we will put in place certain measures to ensure that your personal data does receive an adequate level of protection, such as contractual clauses that have been approved by the European Commission.

### **10. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION**

10.1 It is important that the personal data we hold about you is accurate and up to date. Please keep us informed if your personal information changes.

10.2 Under certain circumstances, by law you have the right to:

11. Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
12. Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
13. Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
14. Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
15. Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
16. Request the transfer of your personal information to another party.
17. If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer by emailing [gdprequiry@meallmore.co.uk](mailto:gdprequiry@meallmore.co.uk) or in writing to:

Data Protection Officer, Meallmore, Caulfield House, Cradlehall Business Park, Inverness IV2 5GH

10.3 You will not have to pay a fee to access your personal data or to exercise any of the other rights under data protection laws. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

10.4 We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### **18. RIGHT TO WITHDRAW CONSENT**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please email us at [gdprenquiry@meallmore.co.uk](mailto:gdprenquiry@meallmore.co.uk) . Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.